IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

Civil Action No. 1:16-cv-03088-ELR

v.

STATE OF GEORGIA,

DEFENDANT.

JOINT MOTION FOR ENLARGEMENT OF TIME

NOW COME the United States of America and the State of Georgia, by and through below counsel of record, and move this Court pursuant to Federal Rule of Civil Procedure 6(b) for an enlargement of time extending the fact discovery deadline to and including September 12, 2022. The grounds for this motion are more particularly set forth in the accompanying memorandum of law.

Dated: September 10, 2021.

Respectfully submitted,

KURT R. ERSKINE

Acting United States Attorney

/s/ Aileen Bell Hughes

Assistant United States Attorney Georgia Bar No. 375505 Aileen.bell.hughes@usdoj.gov 600 U.S. Courthouse 75 Ted Turner Drive SW Atlanta, GA 30303 (404) 581-6000 Fax (404) 581-6181

/s/ Alexa R. Ross

Alexa R. Ross
Georgia Bar No. 614986
aross@robbinsfirm.com
Josh Belinfante
Georgia Bar No. 047399
jbelinfante@robbinsfirm.com
Melanie L. Johnson
Georgia Bar No. 466756
mjohnson@robbinsfirm.com
Danielle M. Hernandez
Georgia Bar No. 736830
dhernandez@robbinsfirm.com
Javier Pico Prats
Georgia Bar No. 664717
javier.picoprats@robbinsfirm.com

Special Assistant Attorney General

Robbins Ross Alloy Belinfante Littlefield LLC 500 14th Street NW Atlanta, GA 30318 Telephone: (678) 701-9381

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

Civil Action No.

v.

1:16-cv-03088-ELR

STATE OF GEORGIA,

DEFENDANT.

Certificate of Service

I served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record. September 10, 2021.

/s/ Aileen Bell Hughes
AILEEN BELL HUGHES
Assistant United States Attorney